

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ANALOG DEVICES, INC. and HITTITE
MICROWAVE LLC,

Plaintiffs,

v.

MACOM TECHNOLOGY SOLUTIONS
HOLDINGS, INC. and MACOM
TECHNOLOGY SOLUTIONS INC.,

Defendants.

Civil Action No.: 1:18-cv-11028-GAO

**ANALOG’S ASSENTED-TO MOTION TO FILE UNDER SEAL
ITS MOTIONS FOR PRELIMINARY INJUNCTION AND EXPEDITED DISCOVERY**

Pursuant to Local Rules 7.2 and 16.6(d)(6), Plaintiffs Analog Devices, Inc. and Hittite Microwave LLC (collectively, “Analog”) respectfully submit this Motion to File Under Seal Analog’s Motion for Preliminary Injunction and the memorandum filed in support thereof, Analog’s related Motion for Expedited Discovery, and the declarations and exhibits filed in support thereof, copies of which are attached hereto. Analog will today publicly file versions of such documents from which it will redact those portions containing highly sensitive and confidential technical, business and trade secret information of Analog, and will file under seal (upon leave of Court), and serve full unredacted copies of these pleadings on outside counsel for Defendants. Defendants have consented to the relief sought herein.

The confidential information Analog seeks to redact includes confidential technical information concerning Analog’s HMC998 and HMC998A products, as well as business and

customer requirements related to such products, some of which are the very trade secrets Analog is seeking to protect by its preliminary injunction motion. Public access to this confidential information would harm Analog's competitive position in the marketplace.

The newly amended Local Rule 16.6(d)(6) provides for a default protective order restricting access to confidential information in patent proceedings that either party in good faith believes is confidential. Analog possesses a good-faith belief that the redacted portions of the documents to be filed contain such confidential information.

WHEREFORE, Analog respectfully requests permission to file under seal its Motion for Preliminary Injunction and memorandum filed in support thereof, its related Motion for Expedited Discovery, and the supporting declarations and exhibits thereto.

Dated: June 29, 2018

Respectfully submitted,

**ANALOG DEVICES, INC. and
HITTITE MICROWAVE LLC**

By their attorneys,

/s/ Steven M. Bauer

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CERTIFICATE OF CONFERENCE

Pursuant to Local Rule 7.1(a)(2), I hereby certify that Analog's counsel met and conferred in good faith with counsel for Defendants MACOM Technology Solutions Holdings, Inc. and MACOM Technology Solutions Inc. to resolve or narrow the issues presented in this motion, and they have consented to the relief sought herein.

/s/ Steven M. Bauer
Steven M. Bauer

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing on June 29, 2018.

/s/ Steven M. Bauer

Steven M. Bauer